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June 23, 2009

**BY CM/ECF**

Hon. Catherine C. Blake  
United States District Judge  
United States District Court for the  
District of Maryland  
101 W. Lombard Street  
Baltimore, Maryland 21201

**Re: Ropax 1 KS and Ropax 2 KS v.  
European Red Sea Africa Lines Ltd, d/b/a ERSAL, et al.,  
Civil Action No. CCB 09-312**

Dear Judge Blake:

We write for plaintiffs Ropax 1 KS and Ropax 2 KS to report the status of this case. We apologize for the delay of this report.

This case is one of seven (7) brought in by Ropax 1 KS and Ropax 2 KS to recover for defendants' breach of their agreements to charter the two car carrying vessels which Ropax 1 KS and Ropax 2 KS collectively own. Ropax 1 KS and Ropax 2 KS brought in addition to this case, companion cases in the other federal Districts in which defendants called their vessels or do business, namely, U.S. District Court, Southern District of Georgia (Savannah)(Civil Action No. 4:09-cv-00076-BAE-GRS); U.S. District Court, Middle District of Florida (Jacksonville)(Civil Action No. 3:09-cv-00126-HLA-TEM), U.S. District Court, Southern District of Texas (Houston)(Civil Action No. 4:09-cv-00515), and U.S. District Court, District of Massachusetts (Boston)(Civil Action No. 1:09-cv-10341-MLW). In addition, Ropax 1 KS and Ropax 2 KS brought two actions in the U.S. District Court, Southern District of New York (Manhattan)(Civil Action Nos. 1:09-cv-04382-MGC and 1:08-cv-10781-MGC) to garnish pursuant to Supplemental Admiralty Rule B, U.S. dollar-denominated wires to and from defendants.

The result of these cases, each including as this case does, Supplemental Rule B maritime attachment and garnishment writs, is that Ropax 1 KS and Ropax 2 KS have succeeded in garnishing approximately \$370,000 in defendants' funds, including \$39,188 in this case held by garnishee Wilhelmsen Ships Service. This, however, falls well short of Ropax 1's present \$5,111,888 damages, and Ropax 2's present \$3,455,043 damages.

Discovery through the Jacksonville and Houston cases has confirmed that defendants do business through a maze of alter-ego Jordanian, Marshal Islands, and Panamanian corporations. The ultimate owner of this corporate maze is the Abu Rashed Group, Amman, Jordan, which purports to own a range of businesses including, those importing used cars from Eastern United States ports to Nigeria and Benin.

After defendants breached their contracts to charter the Ropax 1 KS and Ropax 2 KS vessels, they up until approximately mid-May chartered a series of others to continue their used car trade. Defendants then apparently ceased trading, but plaintiffs believe that defendants - probably, through a set

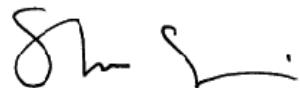
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of newly-created corporations - intend shortly to begin another cycle of vessel calls (utilizing still other, newly-chartered vessels), at some combination of the ports they have called before, that is, Baltimore, Boston, Jacksonville and/or Houston.

Ropax 1 KS and Ropax 2 KS therefore may be amending their actions, here and in the other Districts, to add these new, alter-ego corporations. We expect that these amendments will take place, within the next three (3) weeks.

Ropax 1 KS and Ropax 2 KS therefore request that the Court continue to leave this action open pending these expected amendments, and propose that they report to the Court not later than August 14, 2009 on further progress in the case.

Respectfully Submitted,



J. Stephen Simms